A01-0032

Heating Oil Partners, L.P.

1120 Post Road
Darien, CT 06820

Phone: 203-655-8290
Fax: 203-655-9273

September 29, 2000

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

Re: **National Environmental Performance Track**

Dear Sir or Madam:

I am pleased to submit the National Environmental Achievement Track application for DDLC Fuels, Danielson, Ct. Terminal. Please find enclosed the following materials:

- Application Form.
- Environmental Requirements Checklist.
- Heating Oil Partners Corporate Policy Manual.
- Heating Oil Partners Loss Prevention Plan and Safety Program.

Should you have any questions or require further information, please do not hesitate to contact me at (610) 925-1700. I thank you for your assistance and look forward to hearing from you.

Sincerely yours,

HEATING OIL PARTNERS

William Weber
Director of Capital Resources

Enclosures

National Environmental Achievement Track

Application Form

DDLC Fuels
Name of facility

Heating Oil Partners, L.P.
Name of parent company (if any)

84 Shepard Hill Road
Street address

Street address (continued)

Danielson, CT 06239
City/State/Zip code

Give us information about your contact person for the National Environmental Achievement Track Program.

Name	William Weber	Rich Hyland
Title	Director of Capital Resources	General Manager
Phone	610-925-1700	860-271-2020
Fax	610-925-1705	
E-mail	bweber@hopheat.com	rhyland@hopheat.com

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.

Section A

Tell us about your facility

1 What do you do or make at your facility?

Retail fuel oil and diesel storage terminal. Service center for heating and cooling sales, installations, and repairs.

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
5983

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes ☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☒ Fewer than 50

☐ 50-99

☐ 100-499

☐ 500-1,000

☐ More than 1,000

5 Does your facility have an EPA ID number(s)? If yes, list in the right-hand column.	☐ Yes ☒ No Conditionally exempt small quantity generator.
6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right *or* enclose a completed Checklist with your application.	See Attached Checklist.
7 Check the appropriate box in the right-hand column.	☐ I've listed the requirements above. ☒ I've enclosed the Checklist with my application.
8 Optional: Is there anything else you would like to tell us about your facility?	

Section B

Tell us about your EMS.

Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- **Confirm that your EMS meets the Achievement Track requirements.**
- **Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.**

1 Check ***yes*** if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy ☒ Yes

b. Planning ☒ Yes

c. Implementation and operation ☒ Yes

d. Checking and corrective action ☒ Yes

e. Management review ☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes

3 Did this cycle include both an EMS and a compliance audit? ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes

If yes, what method of EMS assessment did you use?

☒ Self-assessment

☐ GEMI ☐ Other

☐ CEMP Based on GEMI and ISO 14001 comparison.

☐ Third-party assessment

☐ ISO 14001 Certification

☐ Other

Section C

Tell us about your past achievements and future commitments.

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Hazardous Materials Use	15 gal.		0	

i. How is the current level an improvement over the previous level?

Facility previously used approximately 15 gallons of chlorinated solvents per year for equipment cleaning and maintenance. All chlorinated solvents have been replaced with non-chlorinated, non-hazardous cleaning materials.

ii. How did you achieve this improvement?

A corporate-wide commitment to reducing hazardous waste stream required that all chlorinated solvent cleaners be replaced with non-chlorinated, non-hazardous cleaning agents, such as Crystal Simple Green, K K 2, or Spritz. HOP monitors its use of hazardous products through its Hazard Communication Standard Policy and Protocol. See Corp. Policy Manual § C.2.

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Vulnerability and Potential for Releases	7,000 gallons vulnerable		0 gallons vulnerable	

i. How is the current level an improvement over the previous level?

Potential for releases is significantly reduced due to a series of voluntary facility and equipment upgrades, that resulted in expenditures of over $24,000. Most notably, these upgrades resulted in additional protection against the potential release of up to 7,000 gallons of fuel oil during delivery truck loading and off-loading operations.

ii. How did you achieve this improvement?

Installation of a 20,000 gallon holding tank to collect any fuel oil spills that might occur in delivery truck off-loading area, thereby providing an important safeguard against a potential release of up to 7,000 gallons. Also, instituted new procedures for release of stormwater collected from delivery truck loading area: removed sensor that automatically discharged contents of stormwater separator tank to detention basin when oil not detected and replaced with procedure requiring sampling of stormwater prior to manual discharges to holding lagoon. Inspection of all in-service aboveground storage tanks according to API 653 standards. Cleaning and removal of all out-of-service storage tanks.

2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

a. What is the aspect? Emissions of Particulate Matter

b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: Absolute value — 115.4 lbs (for 58 units) (Quantity/Units)

☐ Option B: In terms of units of production or output — (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value — 91.6 lbs (for 58 units) (Quantity/Units)

☐ Option B:
In terms of units of production or output — (Quantity/Units)

e. How will you achieve this improvement?

Offering and promoting a "21-Step Preventative Maintenance Inspection" (PMI) for customer heating units, in order to decrease air emissions. See Corp. Policy Manual, § H.2. For inefficient older units, encourage installation of new equipment. Promote service to customers as providing energy and cost savings, as well environmental benefits. Currently PMI is accomplished for 57% of HOP's 3,889 customers. HOP proposes a goal of performing PMI for 58.5%, or an additional 58 customers. Based on HOP's research, a 20% reduction in filterable particulate emissions can be achieved by the PMI process. In arriving at this estimate, HOP relies on a report prepared by the Columbus Laboratories of Battelle, sponsored by the American Petroleum Institute Committee for Air and Water Conservation, A. Levy, et al., "A Field Investigation of Emissions from Fuel Oil Combustion for Space Heating," page IV-10 (API Project 88-5, 11/1/71). Based on Table IV-4 of this report, filterable particulate emissions average approximately 1.99 pounds per unit per heating season (this figure assumes a wide range of heating units of varying ages and levels of maintenance). A 20% reduction would approximately equal 0.4 pounds per unit. HOP, therefore, estimates that as a result of its proposal to increase PMIs performed from 57% of customers to 58.5% of customers, an additional 58 heating units (3,889 customers X 0.015) will reduce their emissions by approximately 0.4 pounds each, for an approximate total emission reduction of 23.2 pounds per heating season.

Second aspect you've selected

a. What is the aspect?

Total Energy Use

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value — 43,500 gallons fuel oil (for 58 units) (Quantity/Units)

☐ Option B:
In terms of units of production or output — (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value — 42,304 gallons fuel oil (for 58 units)

☐ Option B:
In terms of units of production or output — (Quantity/Units)

e. How will you achieve this improvement?

Offering and promoting a "21-Step Preventative Maintenance Inspection" (PMI) for customer heating units, in order to improve unit efficiency. See Corp. Policy Manual, § H.2. For inefficient older units, encourage installation of new equipment. Promote service to customers as providing energy and cost savings, as well environmental benefits. Currently PMI is accomplished for 57% of HOP's 3,889 customers. HOP proposes a goal of performing PMI for 58.5%, or an additional 58 customers. Based on HOP's data, overall unit efficiency improves by an average of 2.75% following PMIs. HOP bases its estimate of a 2.75 % increase in efficiency on data it collected before and after PMIs on a sampling of thirty (30) heating units. Based on the following equation, HOP expects that approximately 1,196 fewer gallons of fuel oil will be burned in customer heating units during the next season, as a result of the additional 1.5 % of customers serviced by PMIs.

58 additional customer PMIs X 750 ave. gal. oil used per customer X 0.0275 = 1,196 gal.

Third aspect you've selected

a. What is the aspect?

Vulnerability and Potential for Releases

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: Absolute value 0 (Quantity/Units)

☐ Option B: In terms of units of production or output (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: Absolute value 0 (Quantity/Units)

☐ Option B: In terms of units of production or output (Quantity/Units)

e. How will you achieve this improvement?

Institute new First Fill Inspection Policy and Fill Labeling Policy. See Corp. Policy Manual § G.3 and G.4. Through this policy, new customers are encouraged to have HOP inspect, leak check, and tag customer fuel oil tanks prior to HOP's first fill. The policy is expected to lower the incidence of accidental oil spills on customer premises and prevent misdeliveries. The goal is to increase first delivery inspections and tagging, currently done for 15% of new customers, to at least 70% of new customers. A higher goal is not identified at this time, as it is anticipated that a significant number of new customers will first be serviced when there is no opportunity for a first fill inspection, due either to customer schedules or emergency conditions. Although misidentification of customer tanks has not resulted in spills at this facility in the last two years, serious spills related to tank misidentification have occurred at similar facilities in the past. HOP expects that increasing the number of properly labeled customer tanks will further decrease the likelihood of accidental spills related to misidentification. Similarly, it is expected that increasing the customer tank inspection rate will result in fewer spills related to poor tank conditions.

Fourth aspect you've selected

a. What is the aspect?

Solid Waste Reduction - Oil

b. Is this aspect identified as significant in your EMS?

☐ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: Absolute value 550 gal/yr (Quantity/Units)

☐ Option B: In terms of

	units of production or output	(Quantity/Units)
d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.	☒ Option A: Absolute value	220 gal/yr (Quantity/Units)
	☐ Option B: In terms of units of production or output	(Quantity/Units)
e. How will you achieve this improvement?	Unused #2 fuel oil that is accumulated by HOP as a result of filter changes on customer tanks is currently disposed of as waste. HOP plans to filter this oil to remove any particulate matter that may be present and then to use the recovered oil for facility heating. It is anticipated that the current fuel oil waste stream will be reduced by approximately 60%, reducing total waste oil stream from approximately 550 gal/yr to 220 gal/yr.	

4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	Organization	*Name*	*Phone number*
Representative of a Community/ Citizen Group	Northeastern Conn. Chamber of Commerce		(860) 774-8001
State/Local Regulator	CT DEP	Brian Coss	(860) 424-3377
Other community/local reference	Fire Department	Calvin Darrow	(860) 447-5294

Section E
Application and Participation Statement

On behalf of DDLC ENERGY
[my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date Richard Hyland 9/28/2000

Printed Name/Title Richard Hyland, General Manager

Facility Name DDLC ENERGY

Facility Street Address 410 Bank Street, New London, CT 06320

Facility ID Numbers n/a

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail ptrack@indecon.com. Mail completed applications to:

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

National Environmental Achievement Track

Environmental Requirements Checklist

The following Checklist is provided to assist facilities in answering Section A, "Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

Facility Name DDLC ENERGY
Facility Location: 84 Shepard Hill Rd., Danielson, CT 06239
Facility ID Number(s): n/a
(attach additional sheets if necessary)

	Check All That Apply
Air Pollution Regulations	
1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61)	☐
2. Permits and Registration of Air Pollution Sources	☐
3. General Emission Standards, Prohibitions and Restrictions	☐
4. Control of Incinerators	☐
5. Process Industry Emission Standards	☐
6. Control of Fuel Burning Equipment	☐
7. Control of VOCs	☐
8. Sampling, Testing and Reporting	☐
9. Visible Emissions Standards	☐
10. Control of Fugitive Dust	☐
11. Toxic Air Pollutants Control	☐
12. Vehicle Emissions Inspections and Testing	☒
Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above (identify)	
13.	☐
14.	☐
Hazardous Waste Management Regulations	
1. Identification and Listing of Hazardous Waste (40 CFR 261)	
- Characteristic Waste	☒
- Listed Waste	☐
2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)	
- Manifesting	☒

- Pre-transport requirements ☒
- Record keeping/reporting ☒

3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
   - Transfer facility requirements ☐
   - Manifest system and record-keeping ☐
   - Hazardous waste discharges ☐
4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
   - General facility standards ☐
   - Preparedness and prevention ☐
   - Contingency plan and emergency procedures ☐
   - Manifest system, Record keeping and reporting ☐
   - Groundwater protection ☐
   - Financial requirements ☐
   - Use and management of containers ☐
   - Tanks ☐
   - Waste piles ☐
   - Land treatment ☐
   - Incinerators ☐
5. Interim Status Standards for TSD Owners and Operators (40 CFR 265) ☐
6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267) ☐
7. Administered Permit Program (Part B) (40 CFR 270) ☐

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)

8. ☐
9. ☐

Hazardous Materials Management

1. Control of Pollution by Oil and Hazardous Substances (33 CFR 153) ☒
2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302) ☒
3. Hazardous Materials Transportation Regulations (49 CFR 172-173) ☒
4. Worker Right-to-Know Regulations (29 CFR 1910.1200) ☒
5. Community Right-to-Know Regulations (40 CFR 350-372) ☒

Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (identify)

6. ☐
7. ☐

Solid Waste Management

1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257) ☐
2. Permit Requirements for Solid Waste Disposal Facilities ☐
3. Installation of Systems of Refuse Disposal ☐

4. Solid Waste Storage and Removal Requirements ☐
5. Disposal Requirements for Special Wastes ☐

Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (identify)

6. ☐
7. ☐

Water Pollution Control Requirements

1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) ☒
2. Designation of Hazardous Substances (40 CFR 116) ☒
3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117) ☒
4. NPDES Permit Requirements (40 CFR 122) ☐
5. Toxic Pollutant Effluent Standards (40 CFR 129) ☐
6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403) ☐
7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) ☐
8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415) ☐
9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416) ☐
10. Water Quality Standards ☐
11. Effluent Limitations for Direct Dischargers ☐
12. Permit Monitoring/Reporting Requirements ☐
13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants ☐
14. Collection, Handling, Processing of Sewage Sludge ☐
15. Oil Discharge Containment, Control and Cleanup ☒
16. Standards Applicable to Indirect Discharges (Pretreatment) ☐

Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)

17. ☐
18. ☐

Drinking Water Regulations

1. Underground Injection and Control Regulations, Crieria and Standards (40 CFR 144, 146) ☐
2. National Primary Drinking Water Standards (40 CFR 141) ☐
3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) ☐
4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources ☐
5. Underground Injection Control Requirements ☐

6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems ☐

Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above(identify)

7. ☐
8. ☐

Toxic Substances

1. Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704) ☐
2. Import and Export of Chemicals (40 CFR 707) ☐
3. Chemical Substances Inventory Reporting Requirements (40 CFR 710) ☐
4. Chemical Information Rules (40 CFR 712) ☐
5. Health and Safety Data Reporting (40 CFR 716) ☐
6. Pre-Manufacture Notifications (40 CFR 720) ☐
7. PCB Distribution Use, Storage and Disposal (40 CFR 761) ☐
8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762) ☐
9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775) ☐

Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above (identify)

10. ☐
11. ☐

Pesticide Regulations

1. FIFRA Pesticide Use Classification (40 CFR 162) ☐
2. Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165) ☐
3. Certification of Pesticide Applications (40 CFR 171) ☐
4. Pesticide Licensing Requirements ☐
5. Labeling of Pesticides ☐
6. Pesticide Sales, Permits, Records, Application and Disposal Requirements ☐
7. Disposal of Pesticide Containers ☐
8. Restricted Use and Prohibited Pesticides ☐

Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (identify)

9. ☐
10. ☐

Environmental Clean-Up, Restoration, Corrective Action

1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify) ☐

☐

2. RCRA Corrective Action (identify)

☐
☐

Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration, Corrective Action Regulations Not Listed Above (identify)

3. ☐
4. ☐